IV. Environmental Impact Analysis

H.2 Water Resources—Groundwater

1. Introduction

This section of the Draft EIR provides an analysis of the potential Project impacts associated with groundwater level and groundwater quality. This section is based on the *Groundwater Level Technical Report* and the *Groundwater Quality Technical Report* prepared by KPFF Consulting Engineers in February 2012. These technical reports are included in Appendices Q and R of this Draft EIR.

This section evaluates the relationship between the Project Site and the regional and local groundwater hydrology, quality, and applicable regulations. In terms of groundwater hydrology, the section discusses groundwater recharge capacity and the use of groundwater for potable water. Issues specific to groundwater quality are also analyzed, including changes in the rate, movement, or area affected by existing contaminants in groundwater, or conditions that would cause regulatory water quality standards at an existing production well to be violated.

2. Environmental Setting

The following discussion provides an overview of the regulatory setting and the describes existing physical conditions of the Project Site and surrounding areas as they relate to groundwater level and groundwater quality.

a. Regulatory Setting

Numerous federal, State, and local regulations regarding groundwater are relevant to and would be implemented by the Proposed Project. These regulations are provided in Appendix G of this Draft EIR. As discussed therein, at the federal level, these regulations include the Clean Water Act and the Federal Safe Drinking Water Act. State and regional locations include the Porter-Cologne Water Quality Control Act, the California Water Plan, and the Water Quality Control Plan, Los Angeles Region: Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties. At the local level, such regulations include the City of Los Angeles Low Impact Development (LID) Ordinance.

b. Existing Physical Conditions

(1) Regional Conditions

The City of Los Angeles overlies eight groundwater basins as identified in the Los Angeles Regional Water Quality Control Plan, adopted by the Los Angeles Regional Water Quality Control Board, and designated by the California Department of Water Resources. The Los Angeles Coastal Plain includes the West Coast Basin, the Central Basin, the Santa Monica Basin, and the Hollywood Basin, as shown on Figure IV.H.2-1 on page IV.H.2-3.

Groundwater use for domestic water supply is a major beneficial use of groundwater basins in Los Angeles County. Groundwater is harvested via a large number of wells owned and operated by the Los Angeles Department of Water and Power (LADWP) for use by private agricultural, industrial, and domestic users.

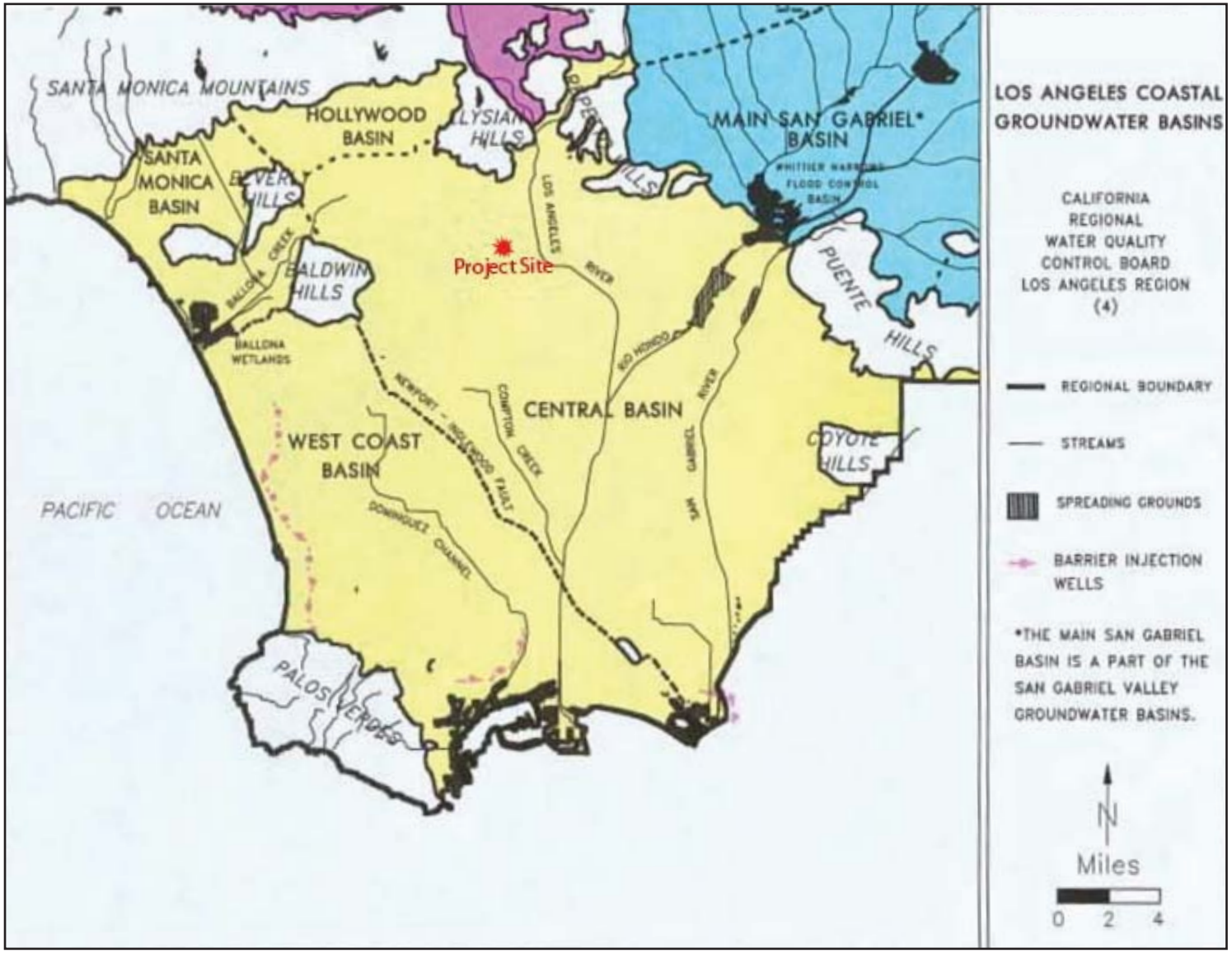
(a) Regional Groundwater Hydrology

Replenishment of groundwater basins occurs primarily by percolation of precipitation throughout the region via permeable surfaces, spreading grounds, and groundwater migration from adjacent basins, as well as injection wells designed to pump freshwater along specific seawater barriers to prevent the intrusion of salt water. Throughout the urban environment as additional impervious surfaces are created and groundwater continues to be harvested, the potential for depletion of groundwater basins increases.

(b) Regional Groundwater Quality

The general quality of groundwater in the Los Angeles Region has degraded from background levels as a result of urban land uses. For example, aboveground storage tanks (AST) and underground storage tanks (UST) in the Los Angeles Coastal Plain have leaked or are leaking, petroleum fuels, solvents, and other hazardous substances into the subsurface. These leaks, as well as other discharges that result from improper handling, storage, and disposal practices, can seep into the subsurface and pollute groundwater.

In the lower aquifers of the Central and West Coast Groundwater Basins, historic over-pumping has led to falling groundwater levels resulting in seawater intrusion. This issue has been largely mitigated through the operation of an artificial recharge system consisting of spreading basins and injection wells that form fresh water barriers along the coast. Groundwater quality in the upper aquifers has been impacted by both organic and inorganic pollutants from a variety of sources, such as leaking tanks, leaking sewer lines, and illegal discharges.



Source: KPFF 2011.

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Figure IV.H.2-1
Los Angeles Coastal Groundwater Basins

(2) Local Area Conditions

The Project Site is underlain by the Los Angeles Coastal Plain's Central Subbasin, commonly referred to as the Central Basin. The Central Basin covers approximately 277 square miles and is bounded on the north by a surface divide called the La Brea High, and on the northeast and east by the Elysian Hills, Repetto Hills, Merced Hills, and Puente Hills. The southeast boundary between the Central Basin and Orange County Groundwater Basin roughly follows Coyote Creek, which is a regional drainage province boundary. The southwest boundary is formed by the Newport Inglewood fault system and the West Coast Basin. Figure IV.H.2-1 on page IV.H.2-3 illustrates the location of the Los Angeles Coastal Basins.

Historically, groundwater flow in the Central Basin has been from recharge areas in the northeast part of the sub basin, toward the Pacific Ocean on the southwest. However, pumping has lowered the water level in the Central Basin causing water levels in some aquifers on both sides of the Newport-Inglewood uplift to be approximately equal. However, even with the decrease in outflow, groundwater continues to flow from the northeast to the southwest toward the West Coast Subbasin.

In a recent report by the Water Replenishment District of Southern California, groundwater data was collected from wells in the deeper basin aquifers where the majority of groundwater pumping occurs. The deeper aquifers include: the Lynwood; Silverado; and Sunnyside. Groundwater levels range from a high of approximately 170 feet above mean sea level (msl) in the northeast portion of the Central Basin above the spreading grounds in the Whittier Narrows to a low of approximately 120 feet below msl in the Long Beach area and approximately 130 feet below msl in the Gardena area. With the exception of the Montebello Forebay and along the West Coast Basin Project, the majority of the groundwater levels in the district are below sea level, which is why continued injection at the seawater barriers is needed to prevent saltwater intrusion. In addition, perched groundwater may be encountered in various locations throughout the region where dense soil conditions allow precipitation to be trapped in the soil strata.

LADWP's water system provides water to the City's 4.1 million residents and businesses. On average LADWP draws 36 percent of its water from the Eastern Sierra, and purchases 52 percent from the Metropolitan Water District of Southern California (MWD). An additional 11 percent comes from pumped groundwater within the West Coast Basin and Central Basin. In an effort to conserve resources, Los Angeles uses recycled water for industrial and irrigation purposes, which represents the remaining 1 percent of total water supply.

(3) Project Site Conditions

Geotechnical investigations in the vicinity of the Project Site have shown that firm natural soil has been encountered to depths that vary from 2 to 10 feet below the surface level. The firm natural soil is underlain by granular and dense sands. Soil conditions have been shown to be conducive to the infiltration of precipitation based on previous geotechnical investigations in the region. However, due to the nature of dense urban development, a large portion of the runoff from the Project Site is directed to public storm drainage infrastructure.

As indicated in the Geotechnical Report prepared by AMEC E&I, Inc. included as Appendix N of this Draft EIR, the historic high groundwater in the vicinity of the Project Site is approximately 90 feet below ground surface. Prior borings drilled to a depth of 100 feet in the vicinity of the Project Site did not report groundwater above that depth, except for minor seepage between approximately 17 and 36 feet below the surface level.

The existing Project Site has been fully developed and is almost completely impervious and, therefore, does not contribute measurably to the groundwater level via percolation of precipitation. The existing site footprint is approximately 94 percent covered by impervious surfaces including buildings such as the South and West Halls of the Convention Center, and STAPLES Center, and impervious pavements for pedestrian and vehicular circulation. Due to the existing depth of over 90 feet to the groundwater level, there are currently no dewatering activities within the Project Site, as existing facilities do not include subterranean development.

Based on the California State Water Resources Control Board's GeoTracker Groundwater Ambient Monitoring & Assessment database there are no production water wells within a 1-mile radius of the Project Site. There are also no existing spreading grounds within 1 mile of the Project Site. Consequently, there is no net contribution or reduction of the groundwater table as a result of existing activity at the Project Site.

As discussed in detail in Section IV.L, Environmental Safety, of this Draft EIR, the Convention Center currently operates seven USTs containing gasoline or diesel fuel (ranging in capacity from 550 gallons to 6,000 gallons). In addition to the seven USTs, the Convention Center has three ASTs containing diesel fuel (ranging in capacity from 120 gallons to 300 gallons), and one AST containing propane. Also reported were three closed in place 280 -gallon USTs. Previously located on the Project Site, a 2,000-gallon-capacity gasoline UST was removed in February 1998 to comply with the City requirements regarding removal of all single-walled USTs. Based on the 1994 assessment and correspondence between the City of Los Angeles Geotechnical Services and Los Angeles Fire Department (LAFD), the area of this former gasoline UST was impacted with BTEX

and TPH in the gasoline range, and the absence of available documents related to remediation of the area represents an environmental concern to the Project Site. All of the current on-site UST and AST operations were noted to be in general compliance with current regulatory requirements (LAFD, South Coast Air Quality Management District, Certified Unified Program Agency, etc.).

STAPLES Center currently operates one 500-gallon-capacity UST containing diesel fuel and one 3,000-gallon-capacity AST containing diesel fuel, both of which are permitted for operation through the LAFD. Section IV.L Environmental Safety, of this Draft EIR, discusses in further detail more information with regard to USTs and ASTs.

3. Environmental Impacts

a. Methodology

(1) Groundwater Level

The analysis of the Project's potential impacts associated with groundwater level is based on the *Groundwater Level Technical Report* prepared by KPFF Consulting Engineers in February 2012 The analysis provides a review of existing groundwater levels and groundwater uses and an evaluation of the potential impacts of the construction and operation of the Proposed Project on those uses. Construction and operational activities evaluated include any potential dewatering activities during construction, proposed land use changes and infiltration capacity of the underlying soil and any permanent dewatering.

(2) Groundwater Quality

The analysis of the potential impacts regarding groundwater quality is based on the *Groundwater Quality Technical Report* prepared by KPFF Consulting Engineers in February 2012. The analysis provides a review of existing groundwater conditions and an evaluation of the potential for construction and operation of the Proposed Project to affect groundwater quality. Construction and operational activities evaluated include potential soil or shallow groundwater exposure to construction materials, wastes, or spilled materials or as a result of construction dewatering, potential permanent dewatering, handling and storage of hazardous materials, and any potential groundwater remediation activities.

b. Thresholds of Significance

Appendix G of the CEQA Guidelines provides a set of sample questions that address impacts with regard to groundwater level and groundwater quality. These questions are as follows:

Would the project:

- Violate any water quality standards or waste discharge requirements?
- Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

(1) Groundwater Level

In the context of the above questions from Appendix G of the CEQA Guidelines, the City of Los Angeles CEQA Thresholds Guide states that a project would normally have a significant impact on groundwater level if it would:

- Change potable water levels sufficiently to:
  - Reduce the ability of a water utility to use the groundwater basin for public water supplies, conjunctive use purposes, storage of imported water, summer/winter peaking, or to respond to emergencies and drought;
  - Reduce yields of adjacent wells or well fields (public or private); or
  - Adversely change the rate or direction of flow of groundwater; or
- Result in demonstrable and sustained reduction of groundwater recharge capacity.

(2) Groundwater Quality

In the context of the above questions from Appendix G of the CEQA Guidelines, the City of Los Angeles CEQA Thresholds Guide states that a project would normally have a significant impact on groundwater quality if it would:

- Affect the rate or change the direction of movement of existing contaminants;
- Expand the area affected by contaminants;
- Result in an increased level or groundwater contamination (including that from direct percolation, injection or salt water intrusion); or
- Cause regulatory water quality standards at an existing production to be violated, as defined in the California Code of Regulations, title 22, Division 4, Chapter 15 and in the Safe Water Drinking Act.

c. Project Design Features

The following project design features would provide groundwater quality benefits relative to preventing pollutants from entering local groundwater and preventing contaminated groundwater from entering surface water flows or municipal stormwater systems during both construction and operation of the Proposed Project.

No Temporary or Permanent Dewatering

Due to the deep level of existing groundwater at the Project Site dewatering would not be required as part of the Proposed Project.

Compliance with NPDES Requirements

The Proposed Project would be designed to comply with all local and State regulations regarding the control of pollutants of concern that may affect the quality of groundwater underlying the Project Site. In particular, compliance with National Pollutant Discharge Elimination System (NPDES) requirements would provide Best Management Practices (BMP) during construction as part of implementation of a Stormwater Pollution Prevention Plan and BMPs during operation in accordance with Standard Urban Stormwater Mitigation Plan provisions. These BMPs, which are described in detail in Section IV.H.1, Hydrology and Surface Water Quality, of the Draft EIR, would include pre-treatment prior to infiltration, and thus, would ultimately help to control potential groundwater pollutants.

Proper Handling and Disposal of Materials

As discussed in detail in Section IV.L, Environmental Safety, of the Draft EIR, the proper disposal, storage, or use of hazardous materials, such as cleaners, agents, solvents, or other construction- or operations-related activities, would occur in accordance with all applicable federal, State, and local requirements. Any non-stormwater discharge would be controlled and properly disposed of through either approved connections to the sanitary sewer system or transported to an approved processing facility to prevent the contamination of site soils or groundwater. In addition, loading docks and storage areas would be designed to provide spill containment and prevent contaminants from reaching the groundwater.

Proper Design of New Storage Tanks

New fuel storage tanks for the operation of a range of mechanical equipment, such as emergency generators, would be designed in accordance with regulatory requirements to prevent leaking of contaminants into the surrounding soils. Measures would include dual containment storage tanks consistent with current codes and standards.

No Injection or Supply Wells

The Proposed Project does not include the installation of injection or supply wells that would affect groundwater quality.

Compliance with LID Ordinance

As discussed in further detail in Section IV.H.1, Hydrology and Surface Water Quality, of this Draft EIR, the Proposed Project would comply with the City's Low Impact Development standards that are intended to promote the use of natural infiltration systems, evapotranspiration, and the reuse of stormwater. The goal of these LID practices is to remove nutrients, bacteria, and metals from stormwater, while also reducing the quantity and intensity of stormwater flows. Through the use of various infiltration strategies, LID is aimed at minimizing impervious surface area. Where infiltration is not feasible, the use of capture and reuse BMPs or biofiltration BMPs that will store, evaporate, detain, and/or treat runoff may be used.[1]

d. Project Impacts

(1) Project Construction

(a) Groundwater Level

The Proposed Project would include excavations with depths ranging from one foot for the New Hall to a maximum depth of approximately 50 feet for the Event Center. However, since the historic high groundwater level in the vicinity of the Project Site is approximately 90 feet below ground surface and prior borings drilled to a depth of 100 feet at the Project Site did not report groundwater above that depth (except for minor seepage between approximately 17 and 36 feet), it is not expected that groundwater would be encountered during construction. Thus neither, temporary nor permanent dewatering

[1] *City of Los Angeles. Low Impact Development Best Management Practices Handbook. June 2011.*

operations would be required. Therefore, the Proposed Project would not have an impact on groundwater level during construction.

(b) Groundwater Quality

As discussed above, excavations required for the construction of the Event Center would range from a depth of one foot for the New Hall to maximum depth of approximately 50 feet for the Event Center. The Proposed Project would also result in a net export of existing soil material. In accordance with regulatory requirements, any contaminated soils within the Project Site would be captured within that volume of excavated material, removed from the site, and remediated at an approved disposal facility. Furthermore, the Proposed Project may include infiltration systems, and dual containment storage tanks, which are addressed above under the Project Design Features subsection.

During on-site grading and building construction, hazardous materials (e.g., fuels, paints, solvents, concrete additives, etc.) could be used and therefore would require proper management and, in some cases, disposal. The management of any resultant hazardous wastes could increase the opportunity for hazardous materials releases into groundwater. However, compliance with all applicable federal, State, and local requirements concerning the handling, storage and disposal of hazardous waste would effectively reduce the potential for the construction of the Proposed Project to release contaminants into groundwater that could expand the area or increase the level of groundwater contamination or cause the violation of regulatory water quality standards at an existing production well as defined in the California Code Regulations, Title 22, Division 4, Chapter 15 and the Safe Drinking Water Act. In addition, as there are no groundwater production wells or public water supply wells within one mile of the Project Site, construction activities are not anticipated to affect existing wells. Therefore, Proposed Project construction would not result in any substantial increase in groundwater contamination through hazardous materials releases and impacts would be less than significant.

(2) Project Operation

(a) Groundwater Level

Approximately 94 percent of the existing footprint of the Project Site is impervious and includes buildings such as the South and West Halls of the Convention Center, STAPLES Center, as well as impervious pavements for pedestrian and vehicular

circulation.[2] Thus, the Project Site does not currently contribute considerably to groundwater levels via percolation or precipitation. The Proposed Project would reduce the percentage of impervious surfaces through the installation of additional landscaped areas. Specifically, the Proposed Project includes approximately 4,317 square feet of landscape areas associated with the Event Center Plaza, 69,485 square feet of landscape areas for Gilbert Lindsay Plaza, and 40,656 square feet of landscape areas along L.A. Live Way. With these open space areas, approximately 93 percent of the Project Site would impervious.[3] This slight decrease in impervious surfaces would not result in a substantial change associated with percolation of irrigation water or precipitation. Therefore, the difference in impervious surfaces would not result in significant impacts associated with groundwater levels.

As discussed above, new buildings within the Project Site would require excavations with a depth ranging from one foot to a maximum of approximately 50 feet below grade. Based on the historic high groundwater level and the absence of groundwater identified as part of the borings on-site, it is not expected that groundwater would be encountered during construction. Thus, permanent dewatering operations would not be required. Therefore, operation of the Proposed Project would not result in significant impacts on groundwater level associated with dewatering.

Interrupting existing injection or supply wells or designated spreading grounds could potentially have an impact on the groundwater level. However, as discussed above, there are no existing wells or spreading grounds within one mile of the Project Site. In addition, the Proposed Project would not include new injection or supply wells. Therefore, the Proposed Project would not impact any existing well or spreading ground.

Infiltration of stormwater as a means of stormwater treatment and management through LID practices is a top tier priority for the Watershed Protection Division of the City of Los Angeles and would be considered along with other treatment options during the

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[2] *The existing site includes approximately 2.9 acres of miscellaneous planted medians, freeway slopes, and landscaped planters around the South Hall that will remain after construction. This is in addition to the approximately 1.3 acres of existing landscaping within the Event Center Plaza, Gilbert Lindsay Plaza, Pico Blvd, and L.A. Live Way. The total existing pervious area for the overall Project Site is approximately 4.2 acres. This accounts for approximately 6 percent of the 71.73 acres, which includes the approximate 3.73 acres of public streets surrounding and traversing the Project Site.*

[3] *Following implementation of the Proposed Project, the Project Site would include the 2.9 acres of pervious surface mentioned above, as well as the new 2.14 acres of landscaped area for open space areas. The total proposed pervious area for the overall Project Site is approximately 5.04 acres. This accounts for roughly 7 percent of the 71.73 acres, which includes the approximate 3.73 acres of public streets surrounding and traversing the Project Site.*

design phase of the Proposed Project. Infiltration systems are designed to capture and infiltrate only the first flush or first 0.75 inch of rainfall for any storm event, considered to carry the majority of the pollutants of concern. When a major storm event occurs, any rainfall in excess of the first 0.75 inch is presumed to be relatively clean. The excess runoff is designed to overflow or by-pass the infiltration system and discharge to the municipal storm drain system. Thus, large storm events are not expected to have an impact on the groundwater level, including the direction of groundwater flow that travels from Northeast to Southwest.

Based on the above, operation of the Proposed Project would not result in significant impacts associated with groundwater level.

(b) Groundwater Quality

As discussed above, operation of the Proposed Project would not require direct discharge to or extraction from the groundwater supply based on the depth of excavation for the new buildings and the depth of groundwater below the Project Site, which has a historic high of 90 feet below ground surface.

In accordance with NPDES requirements, the Proposed Project may utilize infiltration as a means of treatment and disposal of the first flush or 0.75 inch of rainfall of any rain event. Incidental percolation of irrigation water and precipitation from landscaped areas may also contribute marginal volumes of runoff to groundwater. The majority of pollutants of concern for stormwater runoff are captured and filtered out by soils, with the exception of nitrates often used in landscaping fertilizers. As discussed in Section IV.H.1, Hydrology and Surface Water Quality, although landscaped areas account for roughly 6 percent of the existing conditions at the Project Site and approximately 7 percent of the Project Site following implementation of the Proposed Project, as part of Project Design Feature H.1-3, nitrates would be controlled through the selection of native plants and minimal use of nitrogen based fertilizers in on-going landscape maintenance.

The Proposed Project would also result in increased activity at the Project Site, which would result in an increase in the usage of fuels, lubricants and other potential pollutants. Surface spills from the handling of hazardous materials most often involve small quantities and are cleaned up in a timely manner thereby resulting in little threat to groundwater below the Project Site. As described under the Project Design Features subsection above, compliance with all applicable existing regulations and plans at the Project Site would prevent the Proposed Project from affecting or expanding any potential areas affected by contamination, increasing the level of contamination, or causing regulatory water quality standards at an existing production well to be violated. In addition, as described above, there are no production water wells within a one-mile radius of the

Project Site that would have the potential to be affected by operation of the Proposed Project.

Based on the above, operation of the Proposed Project would not result in significant impacts associated with groundwater quality.

4. Cumulative Impacts

a. Groundwater Level

Cumulative groundwater level impacts could result from construction activity located in proximity to the Proposed Project and related Project Sites. However, since the historic high groundwater level is at a depth 90 feet below grade, it is not expected that groundwater would be encountered during construction and temporary or permanent dewatering operations would not be required. Therefore, the Proposed Project would not contribute to cumulative groundwater level impacts.

Cumulative groundwater level impacts could also result from the overall utilization of respective groundwater basins located in proximity to the Proposed Project and related project sites. To the extent that it is possible that public supply wells are located within or near the related project sites, and the related projects could extract water or require water to be extracted by water supply agencies from local basins, such cumulative utilization of groundwater in the region could adversely affect local and regional groundwater hydrology, including groundwater levels. However, the extent to which the related projects would extract or otherwise directly utilize groundwater is not possible to assess. All or most of the related projects would depend on public water supply systems (e.g., LADWP). All of the significant local groundwater basins are adjudicated and essentially not able to be over produced due to water rights limitations. To the extent there is a cumulative increase in water demand, such demand would have to be met with other sources (i.e., water conservation and recycled and imported water). As such, cumulative impacts on groundwater hydrology associated with use of groundwater basins would be less than significant.

Cumulative groundwater hydrology impacts could result from some net conversion of existing impervious surfaces to pervious surfaces, which has the potential to slightly change groundwater levels. However, the Proposed Project and the related projects are located in a highly urbanized area, and any reduction in groundwater recharge due to the overall net change in impervious area due to the related projects would be minimal from a regional groundwater basin perspective. As described above, the Proposed Project itself would result in a minor reduction in impervious surfaces. Therefore, cumulative groundwater level impacts from changes in the amount of impervious surfaces in the

groundwater basin resulting from the Proposed Project and related projects would be less than significant.

Cumulative groundwater level impacts could also result from interruptions to existing injection or supply wells or designated spreading grounds which has the potential to change groundwater levels. However, there are no production wells, spreading grounds, or injection wells within a one-mile radius of the Project Site. Therefore, cumulative impacts to groundwater levels due to interruptions to existing injection or supply wells or designated spreading grounds would be less than significant.

Cumulative groundwater level impacts associated with the Proposed Project and related projects could result from infiltration of stormwater as a means of stormwater treatment and management through LID practices. However, these systems are designed only to infiltrate small storm events or the first 0.75 inch of rainfall for any storm event. As a result, cumulative impacts to groundwater levels due the infiltration of stormwater as a means of stormwater treatment and management through LID practices would be less than significant.

b. Groundwater Quality

Although development of related projects could include groundwater remediation, development associated with the Proposed Project is not expected to include activities that would require groundwater remediation that could affect groundwater quality. Therefore, no cumulative groundwater impacts are anticipated. In addition, related projects are unlikely to cause or increase groundwater contamination based on existing statutes that prohibit contamination of groundwater by existing and future land uses and also require remediation of existing contamination. In addition, the Proposed Project is not anticipated to affect the rate or direction of movement of existing contaminants; expand the areas affected by contaminants; increase the level of groundwater contamination (including that from direct percolation, injection or saltwater intrusion); or cause regulatory water quality standards of existing production wells to be violated. Thus, cumulative groundwater quality impacts associated with the Proposed Project and related projects would be less than significant.

5. Project Design Features and Mitigation Measures

a. Project Design Features

Sections IV.L, Environmental Safety, and IV.H.1, Hydrology and Surface Water Quality, of this Draft EIR include project design features that also address groundwater

level and groundwater quality. No additional project design features are proposed with regard to groundwater level and groundwater quality.

b. Mitigation Measures

(1) Groundwater Level

As discussed above, no significant impacts associated with groundwater level would result from construction or operation of the Proposed Project. Therefore, no mitigation measures are required.

(2) Groundwater Quality

As discussed above, no significant impacts associated with groundwater quality would result from construction or operation of the Proposed Project. Therefore, no mitigation measures are required.

6. Level of Significance After Mitigation

Project impacts with respect to groundwater levels and groundwater quality would be less than significant, and no mitigation measures are required.